

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASE NO. 00-6360-DIMITROULEAS

ADRIANO MARTINEZ,

Defendant.

MOTION TO DISCHARGE BOND AND MOTION
FOR DISBURSEMENT OF 10% DEPOSIT

COMES NOW the Defendant, ADRIANO MARTINEZ, by and through undersigned counsel and respectfully requests this Honorable Court grant this motion and would allege as follows:

1. The Defendant, ADRIANO MARTINEZ, was arrested on December 22, 2000 and charged with receiving and possessing stolen goods and chattels of a value in excess of \$1,000 which were part of an interstate shipment of freight, in violation of 18 U.S.C. §659.

2. The Defendant, ADRIANO MARTINEZ, entered into a plea of guilty on April 20, 2001 to the aforementioned charges.

3. The Defendant, ADRIANO MARTINEZ, was released on a \$10,000.00 personal surety bond with 10% (\$1,000.00 cash) deposit to the Clerk of the Court.

3. The Defendant, ADRIANO MARTINEZ, was sentenced to six months of home confinement and is presenting serving his sentence.

4. The Defendant, ADRIANO MARTINEZ, has fully complied with all conditions of the appearance bond in this case.

WHEREFORE, it is requested that this Honorable Court enter its order discharging the sureties who executed the appearance bond and further Order the Clerk of Court to return to the Depositor, Aida Martinez Seijas, the \$1,000.00, 10% cash bond posted and evidenced by Receipt No. 401 521342 (Attached hereto as Exhibit A).

Respectfully submitted,

STEPHEN J. GOLEMBE, ESQUIRE
Terremark Centre - Suite 1400
2601 South Bayshore Drive
Coconut Grove, Florida 33133
(305) 858-0404


STEPHEN J. GOLEMBE, ESQUIRE

CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct of the foregoing was forwarded to Assistant United States Attorney Donald Chase, 99 Northeast 4th Street, Miami, Florida 33128 on this 10th day of August, 2001.


STEPHEN J. GOLEMBE, ESQUIRE

Tue Jan 9 14:41:46 2001

UNITED STATES DISTRICT COURT

MIAMI, FL

Receipt No. 401 521342
Cashier Fleming

Tender Type CASH

Transaction Type C

Case No./Def No. 0:99-CR-000000/ 0

EO Code	Div No	Acct
4600	0	604700

Amount \$ 1000.00

AIDA MARTINEZ SEIJAS - SSN 590-72-5121

00CR6360/WFO/APPEARANCE BOND/ADRIANO MARTINEZ